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## **U.S. Department of Justice**

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

March 2, 2015

## **BY ECF**

The Honorable Loretta A. Preska Chief United States District Judge United States Courthouse 500 Pearl Street New York, New York 10007

Re: <u>United States</u> v. <u>Ericson Vargas Cardona</u>

S1 11 Cr. 349 (LAP)

Dear Judge Preska:

The Government writes, with defendant Ericson Vargas Cardona's consent, to respectfully request an adjournment of the status conference currently scheduled for today, March 2, 2015.

Since the last appearance in this matter, the parties have been engaged in productive discussions about a potential disposition of the case, and the parties are optimistic that this case will be resolved prior to trial. In order to allow additional time for these discussions, the Government requests that the Court adjourn the conference and schedule a plea for March 30, 2015 at 3:30 p.m. The Government also moves to exclude the time between March 2, 2015 and March 30, 2015 in the interests of justice, to allow the parties to continue discussing a possible resolution of this matter prior to trial. See 18 U.S.C. § 3161(h)(7)(A). Defense counsel has expressly consented to such an exclusion on Vargas Cardona's behalf.

Respectfully submitted,

PREET BHARARA United States Attorney

By:

Edward Y. Kim / Michael Ferrara Assistant U.S. Attorneys 212-637-2401 / -2526

Cc: David Wikstrom, Esq. Christopher Madiou, Esq.